

**IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

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| In re: FRANCHISE GROUP, INC., et al.,¹ Debtors. | § § § § § | Chapter 11 Case No. 24-12480-JTD (Jointly Administered) |
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**NOTICE OF APPEARANCE AND
REQUEST FOR NOTICE AND SERVICE OF PLEADINGS**

PLEASE TAKE NOTICE that Village at the Mall Holdings, LLC (“**Village at the Mall**”), by and through its counsel, Singer & Levick, P.C., files this, its *Notice of Appearance and Request for Notice and Service of Pleadings*.

Pursuant to Bankruptcy Rules 2002 and 9007, and Sections 102(1), 342 and 1109(b) of the BANKRUPTCY CODE, Village at the Mall respectfully requests that all notices given or required to be given in these proceedings and all papers served or required to be served in these proceedings be served upon its counsel at the address, telephone number and email address listed below.

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of their U.S. federal tax identification numbers, to the extent applicable, are Franchise Group, Inc. (1876), Freedom VCM Holdings, LLC (1225), Freedom VCM Interco Holdings, Inc. (2436), Freedom Receivables II, LLC (4066), Freedom VCM Receivables, Inc. (0028), Freedom VCM Interco, Inc. (3661), Freedom VCM, Inc. (3091), Franchise Group New Holdco, LLC (0444), American Freight FFO, LLC (5743), Franchise Group Acquisition TM, LLC (3068), Franchise Group Intermediate Holdco, LLC (1587), Franchise Group Intermediate L, LLC (9486), Franchise Group Newco Intermediate AF, LLC (8288), American Freight Group, LLC (2066), American Freight Holdings, LLC (8271), American Freight, LLC (5940), American Freight Management Company, LLC (1215), Franchise Group Intermediate S, LLC (5408), Franchise Group Newco S, LLC (1814), American Freight Franchising, LLC (1353), Home & Appliance Outlet, LLC (n/a), American Freight Outlet Stores, LLC (9573), American Freight Franchisor, LLC (2123), Franchise Group Intermediate B, LLC (7836), Buddy’s Newco, LLC (5404), Buddy’s Franchising and Licensing LLC (9968), Franchise Group Intermediate V, LLC (5958), Franchise Group Newco V, LLC (9746), Franchise Group Intermediate BHF, LLC (8260); Franchise Group Newco BHF, LLC (4123); Valor Acquisition, LLC (3490), Vitamin Shoppe Industries LLC (3785), Vitamin Shoppe Global, LLC (1168), Vitamin Shoppe Mariner, LLC (6298), Vitamin Shoppe Procurement Services, LLC (8021), Vitamin Shoppe Franchising, LLC (8271), Vitamin Shoppe Florida, LLC (6590), Betancourt Sports Nutrition, LLC (0470), Franchise Group Intermediate PSP, LLC (5965), Franchise Group Newco PSP, LLC (2323), PSP Midco, LLC (6507), Pet Supplies “Plus”, LLC (5852), PSP Group, LLC (5944), PSP Service Newco, LLC (6414), WNW Franchising , LLC (9398), WNW Stores, LLC (n/a), PSP Stores, LLC (9049), PSP Franchising, LLC (4978), PSP Subco, LLC (6489), PSP Distribution, LLC (5242), Franchise Group Intermediate SL, LLC (2695), Franchise Group Newco SL, LLC (7697), and Educate, Inc. (5722). The Debtors’ headquarters is located at 109 Innovation Court, Suite J, Delaware, Ohio 43015.

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PLEASE TAKE FURTHER NOTICE that pursuant to Section 1109(b) of the BANKRUPTCY CODE, the foregoing request includes not only the notices and papers referred to in the Rules specified above, but also includes, without limitation, Orders and notices of any Application, Motion, Petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, whether transmitted or conveyed by mail, delivery, telephone, facsimile, or otherwise.

PLEASE TAKE FURTHER NOTICE that this *Notice of Appearance and Request for Notice and Service of Pleadings* is without prejudice to: (1) Village at the Mall's rights, remedies, claims, actions, defenses, setoffs, or recoupments, in law or in equity, against the Debtor and any other entities either in this case or in any other action, all of which rights, remedies, claims, actions, defenses, setoff and recoupments are expressly reserved, and (2) any objection which may be made to the jurisdiction of the Court, and shall not be deemed or construed to submit Village at the Mall to the jurisdiction of the Court.

DATED: January 3, 2025

Respectfully submitted,

SINGER & LEVICK, P.C.

By: /s/ Michelle E. Shriro
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ATTORNEYS FOR:
VILLAGE AT THE MALL HOLDINGS, LLC

CERTIFICATE OF SERVICE

I hereby certify that a copy of this document will be electronically mailed to the parties that are registered or otherwise entitled to receive electronic notices in this case pursuant to the Electronic Filing Procedures in this District, which includes the parties listed below, on this 3rd day of January, 2025.

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| <u>Debtors:</u> Franchise Group, Inc., <i>et al.</i> 109 Innovation Court, Suite J Delaware, Ohio 43015 VIA ECF Noticing through its attorneys | <u>Counsel to the Debtors:</u> Debra M. Sinclair Matthew A. Feldman Betsy L. Feldman Willkie Farr & Gallagher LLP 787 Seventh Avenue New York, NY 10019 VIA ECF Noticing |
| <u>US Trustee:</u> Timothy J. Fox Office of the United States Trustee for the District of Delaware J. Caleb Boggs Federal Building 844 King Street, Room 2207 Wilmington, DE 19801 VIA ECF Noticing | Edmon L. Morton Matthew B. Lunn Allison S. Mielke Young Conaway Stargatt and Taylor, LLP 1000 North King Street Wilmington, DE, 19801 VIA ECF Noticing |

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| <p><u>Counsel to the Committee:</u> Bradford J. Sandler Robert J. Feinstein Paul J. Labov Theodore S. Heckel Pachulski Stang Ziehl & Jones LLP 780 Third Avenue, 34th Floor New York NY 10017 VIA ECF Noticing</p> | <p><u>Counsel to the DIP Lenders and Ad Hoc Group of First Lien Secured Lenders:</u> Jayme Goldstein Jeremy Evans Isaac Sasson Paul Hastings LLP 200 Park Avenue New York, NY 10166 VIA ECF Noticing</p> <p>Adam G. Landis Matthew McGuire Landis Rath & Cobb LLP 919 N. Market Street, Suite 1800 Wilmington, DE 19317 VIA ECF Noticing</p> |
| <p><u>Counsel to the ABL Secured Parties:</u> Jennifer Ezring James Ktsanes Andrew Sorkin Latham & Watkins LLP 1271 Avenue of the Americas New York, NY 10020 VIA ECF Noticing</p> | <p><u>Counsel to the Second Lien Secured Parties and HoldCo Lenders:</u> Thomas Lauria White & Case LLP 200 S Biscayne Blvd Miami, FL 33131 VIA ECF Noticing</p> <p>Bojan Guzina White & Case LLP 111 S. Wacker Dr., Suite 5100 Chicago, IL 60606 VIA ECF Noticing</p> |

/s/ Michelle E. Shiro
Michelle E. Shiro